

**CASE UNSEALED PER ORDER OF COURT**

2014 MAR 14 PM 03:03

UNITED STATES DISTRICT COURT *OK*

SOUTHERN DISTRICT OF CALIFORNIA

September 2013 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

ISMAEL ZAMBADA-GARCIA (1),

aka "El Mayo,"

aka "Doc,"

ISMAEL ZAMBADA-IMPERIAL (2),

aka "Mayito Gordo,"

aka "Good Guy,"

ISMAEL ZAMBADA-SICAIROS (3),

aka "Mayito Flaco,"

aka "Caballero,"

Defendants.

Case No. 14CR0658DMS

I N D I C T M E N T

Title 21, U.S.C., Secs. 848(a) and (b) - Continuing Criminal Enterprise; Title 21, U.S.C., Secs. 959, 960, and 963 - Conspiracy to Distribute Methamphetamine, Cocaine, Heroin and Marijuana Intended for Importation; Title 21, U.S.C., Secs. 952, 960, and 963 - Conspiracy to Import Methamphetamine, Cocaine, Heroin and Marijuana; Title 18, U.S.C., Secs. 1956(h) and 1956(a)(2)(A) - Conspiracy to Launder Money; Title 21, U.S.C., Sec. 853, Title 18, U.S.C., Sec. 982, and Title 28, U.S.C., Sec. 2461(c) - Criminal Forfeiture

The grand jury charges:

Count 1

1. Beginning no later than in or about May 2005 and continuing up to and including March 14, 2014, within the Southern District of California, and elsewhere, defendant ISMAEL ZAMBADA-GARCIA, aka "El Mayo," aka "Doc," did knowingly and intentionally engage in a continuing criminal enterprise by violating various felony provisions of the Controlled Substances Act (Title 21, United States Code, Sections 801, et seq.), including but not limited to Title 21, United States Code, Sections 959, 960 and 963, as alleged in Count 2, and

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(WAT)

1 Sections 952, 960 and 963, as alleged in Count 3, which violations  
2 were part of a continuing series of violations of said Act and were  
3 undertaken by defendant in concert with five or more other person with  
4 respect to whom defendant occupied a position of organizer, supervisor  
5 and other position of management, and from which such continuing  
6 series of violations defendant obtained substantial income and  
7 resources.

8       2. Furthermore, defendant ISMAEL ZAMBADA-GARCIA, aka "El Mayo,"  
9 aka "Doc," was a principal administrator, organizer, supervisor and  
10 leader of the criminal enterprise, which involved a conspiracy to  
11 distribute 150 kilograms and more of cocaine, a Schedule II Controlled  
12 Substance, for the purpose of unlawful importation into the United  
13 States, and a conspiracy to import 150 kilograms and more of cocaine,  
14 a Schedule II Controlled Substance, into the United States from a  
15 place outside thereof.

16 All in violation of Title 21, United States Code, Sections 848(a)  
17 and (b).

18    Count 2

19       Beginning no later than in or about May 2005 and continuing up to  
20 and including March 14, 2014, defendants ISMAEL ZAMBADA-GARCIA, aka  
21 "El Mayo," aka "Doc," ISMAEL ZAMBADA-IMPERIAL, aka "Mayito Gordo,"  
22 aka "Good Guy," and ISMAEL ZAMBADA-SICAIROS, aka "Mayito Flaco,"  
23 aka "Caballero," did knowingly and intentionally conspire with each  
24 other, and with other persons known and unknown to the grand jury, to  
25 distribute 500 grams and more of a mixture and substance containing a  
26 detectable amount of methamphetamine and 5 kilograms and more of  
27 cocaine, both Schedule II Controlled Substances; and 1 kilogram and  
28 more of heroin and 100 kilograms and more of a mixture and substance

1 containing a detectable amount of marijuana; both Schedule I  
2 Controlled Substances; for the purpose of unlawful importation into  
3 the United States; all in violation of Title 21, United States Code,  
4 Sections 959, 960, and 963.

5    Count 3

6    Beginning no later than in or about May 2005 and continuing up to  
7 and including March 14, 2014, within the Southern District of  
8 California, and elsewhere, defendants ISMAEL ZAMBADA-GARCIA, aka "El  
9 Mayo," aka "Doc," ISMAEL ZAMBADA-IMPERIAL, aka "Mayito Gordo,"  
10 aka "Good Guy," and ISMAEL ZAMBADA-SICAIROS, aka "Mayito Flaco,"  
11 aka "Caballero," did knowingly and intentionally conspire with each  
12 other, and with other persons known and unknown to the grand jury, to  
13 import 500 grams and more of a mixture and substance containing a  
14 detectable amount of methamphetamine and 5 kilograms and more of  
15 cocaine, both Schedule II Controlled Substances; and 1 kilogram and  
16 more of heroin and 100 kilograms and more of a mixture and substance  
17 containing a detectable amount of marijuana; both Schedule I  
18 Controlled Substances; into the United States from a place outside  
19 thereof; all in violation of Title 21, United States Code,  
20 Sections 952, 960, and 963.

21    Count 4

22    Beginning no later than in or about May 2005 and continuing up to  
23 and including March 14, 2014, within the Southern District of  
24 California and elsewhere, defendant ISMAEL ZAMBADA-GARCIA, aka "El  
25 Mayo," aka "Doc," did knowingly and intentionally conspire with other  
26 persons known and unknown to the grand jury to commit offenses against  
27 the United States under Title 18, United States Code, Section 1956,  
28 namely: transport, transmit and transfer monetary instruments and

1 funds, that is United States currency, from a place in the United  
2 States to and through a place outside the United States, with the  
3 intent to promote the carrying on of specified unlawful activity, that  
4 is the distribution of controlled substances, in violation of  
5 Title 18, United States Code, Section 1956(a)(2)(A); all in violation  
6 of Title 18, United States Code, Section 1956(h).

## Criminal Forfeiture Allegations

8       1. The allegations contained in Counts 1 through 4 of this  
9 Indictment are realleged and by reference fully incorporated herein  
10 for the purpose of alleging forfeiture to the United States of America  
11 pursuant to the provisions of Title 21, United States Code,  
12 Section 853, and Title 18, United States Code, Section 982.

13       2. As a result of the commission of the felony offenses alleged  
14 in Counts 1 through 3 of this Indictment, said violations being  
15 punishable by imprisonment for more than one year and pursuant to  
16 Title 21, United States Code, Sections 853(a)(1) and 853(a)(2),  
17 defendants ISMAEL ZAMBADA-GARCIA, aka "El Mayo," aka "Doc," ISMAEL  
18 ZAMBADA-IMPERIAL, aka "Mayito Gordo," aka "Good Guy," and ISMAEL  
19 ZAMBADA-SICAIROS, aka "Mayito Flaco," aka "Caballero," shall, upon  
20 conviction, forfeit to the United States all their rights, title and  
21 interest in any and all property constituting, or derived from, any  
22 proceeds any defendant obtained, directly or indirectly, as the result  
23 of the felony offense alleged in this Indictment, and any and all  
24 property used or intended to be used in any manner or part to commit  
25 and to facilitate the commission of the violation alleged in this  
26 indictment.

27       3. As a result of the commission of the felony offense alleged  
28 in Count 4 of this Indictment, said violation being punishable by

1 imprisonment for more than one year, and pursuant to Title 18, United  
2 States Code, Section 982(a)(1), defendant ISMAEL ZAMBADA-GARCIA,  
3 aka "El Mayo," aka "Doc," shall, upon conviction, forfeit to the  
4 United States all rights, title and interest in any and all property  
5 involved in such offense, and any property traceable to such property.

6 4. If any of the above-described forfeitable property, as a  
7 result of any act or omission of the defendant:

- 8 a. cannot be located upon the exercise of due diligence;
- 9 b. has been transferred or sold to, or deposited with, a  
10 third party;
- 11 c. has been placed beyond the jurisdiction of the Court;
- 12 d. has been substantially diminished in value; or
- 13 e. has been commingled with other property which cannot be  
14 subdivided without difficulty;

15 it is the intent of the United States, pursuant to Title 21,  
16 United States Code, Section 853(p), to seek forfeiture of any other  
17 property of the defendant up to the value of the said property listed  
18 above as being subject to forfeiture.

19 All in violation of Title 21, United States Code, Section 853,  
20 Title 18, United States Code, Section 982, and Title 28, United States  
21 Code, Section 2461(c).

22 DATED: March 14, 2014.

23 A TRUE BILL:  
24

25 LAURA E. DUFFY  
26 United States Attorney  
27 By:   
28 ADAM L. BRAVERMAN  
Assistant U.S. Attorney